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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$106,590.00 IN U.S.
CURRENCY,

Defendant.

2:20-MC-00311-WBS-CKD

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and claimant Adrian Ortega ("claimant"), by and through their respective counsel, as follows:

1. On September 29, 2020, the claimant filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$106,590.00 in U.S. Currency (hereafter "defendant currency"), which was seized on June 23, 2020.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline is December 18, 2020.

4 4. By Stipulation and Order filed December 18, 2020, the parties stipulated to extend to
5 March 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
9 extend to May 17, 2021, the time in which the United States is required to file a civil complaint for
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
11 currency is subject to forfeiture.

12 6. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to May 17, 2021.

15 DATED: 3/18/2021

PHILLIP A. TALBERT
Acting United States Attorney

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17 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


18
19 DATED: 3/17/2021

/s/ Robert L. Forkner
ROBERT L. FORKNER
Attorney for claimant Adrian Ortega

(Authorized via phone)

22
23 IT IS SO ORDERED.

24 Dated: March 19, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE